

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : Case# 19-14074
Michael A. David :
: :
:

**DEBTOR MICHAEL A. DAVID'S MOTION TO EXTEND AUTOMATIC STAY
PURSUANT TO 11 U.S.C. SECTION 362(c)**

Debtor Michael A. David files the herein Motion to Extend the Automatic Stay pursuant to 11 U.S.C. Section 362(c) and in support hereof avers the following:

1. On June 26, 2018 Debtor filed the instant Chapter 13 Petition.
2. This is Debtor's Second Bankruptcy filing within the past year of dismissal. The last case, case# 17-18598 was dismissed due to failure to timely make payments.
3. There has been a substantial change in circumstances in that Debtor makes more income than her previous bankruptcy (approximately \$10,000 per year gross more) than the income he made in his prior bankruptcy with slightly less monthly expenses. As a result, Debtor has approximately more disposable income than his previous bankruptcy.
4. The instant Bankruptcy filing is in good faith and Debtor has sufficient disposable income to fund the Plan filed in this case.
5. Debtor needs the automatic stay extended beyond thirty (30) days so he can be protected from future collection activities of her creditors and have an opportunity to effectively reorganize in this case.

WHEREFORE, Debtor requests that this Honorable Court grant the herein Motion and enter the attached Order.

Dated: July 3, 2019

\s\ Jermaine Harris, Esquire

Jermaine Harris, Esquire
100 South Broad Street, Suite 1523
Philadelphia, PA 19110
(215)385-1091

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Michael A. David :
_____ :
_____ :

ORDER

AND NOW, this _____ day of _____ 2018, upon consideration of
Debtor Michael A. David's Motion to Extend the Automatic Stay and any response thereto

IT IS HEREBY ORDERED that the Automatic Stay as stated in 11 U.S.C. Section 362(a) is extended
as to all of Debtor's creditors forthwith.

J.

CERTIFICATE OF SERVICE

I, Jermaine Harris, attorney for Debtor hereby certify that on July 3, 2019, I served all creditors listed in Schedules D, E, and F with a true and correct copy of Debtor's Motion to Extend stay via first class regular mail.

\s\ Jermaine Harris, Esquire

Dated: July 3, 2019

Jermaine Harris, Esquire